

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

INNOVATIVE SOLUTIONS  
INTERNATIONAL, INC., a Washington  
corporation,

**Plaintiff,**

V.

HOULIHAN TRADING CO., INC., a Florida corporation; PILGRIM'S PRIDE CORP., a Delaware corporation; and Does 1-10,

#### Defendants.

No. 2:22-cv-00296-JCC

STIPULATED MOTION AND  
[PROPOSED] ORDER RE:  
DEFENDANT HOULIHAN  
TRADING CO., INC.'S MOTION  
FOR EQUITABLE INDEMNITY,  
EQUITABLE SUBROGATION,  
AND FOR STATUTORY COSTS

**NOTE ON MOTION CALENDAR:  
March 27, 2025**

## **STIPULATED MOTION**

Pursuant to Local Civil Rules 7(d)(1) and 10(g), Defendant Pilgrim’s Pride Corp. (“Pilgrim’s”) and Defendant Houlihan Trading Co., Inc. (“Houlihan”) hereby stipulate (subject to Court approval) to the following proposed briefing schedule on Houlihan’s pending Motion for Equitable Indemnity, Equitable Subrogation, and Statutory Costs (“Motion”) (Dkt. 372). In support of this request, the parties stipulate and agree as follows:

1. On January 10, 2025, the parties stipulated that Pilgrim's deadline to respond to Houlihan's post-trial opening briefing would be two weeks after Houlihan filed its Motion. Dkt. 350. The Court granted the parties' stipulated motion. Dkt. 351.

1       2. On March 14, 2025, Houlihan filed its Motion for Equitable Indemnity, Equitable  
 2 Subrogation, and Statutory Costs. Dkt. 372. Under the Order at Dkt. 351, Pilgrim's opposition is  
 3 due on March 28, 2025.

4       3. Under the default briefing schedule under Local Civil Rule 7(d)(4), Pilgrim's  
 5 opposition would be due April 4, 2025.

6       4. Due to Pilgrim's counsel's previously planned travel during spring break,  
 7 Pilgrim's requires additional time to respond.

8       5. Accordingly, the parties stipulate and agree (subject to Court approval) that  
 9 Pilgrim's opposition shall be due April 4, 2025. The noting date and Houlihan's deadline for  
 10 filing a reply brief will remain unchanged, April 11, 2025.

11      6. Based on the foregoing, the parties respectfully request that the Court grant this  
 12 stipulated motion through entry of the Proposed Order below.

13      IT IS SO STIPULATED.

15      DATED this 27th day of March, 2025.

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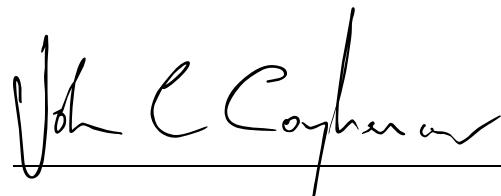
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1                   **{PROPOSED} ORDER**

2         The Court GRANTS the Parties' stipulated motion. Defendant Pilgrim's opposition to  
3 Houlihan's pending Motion for Equitable Indemnity, Equitable Subrogation, and Statutory Costs  
4 ("Motion") (Dkt. 372) shall be due April 4, 2025.

5         IT IS SO ORDERED this 27th day of March, 2025.

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11                   John C. Coughenour  
12                   United States District Judge